Ethan Preston (263295) ep@eplaw.us PRESTON LAW OFFICES 4054 McKinney Avenue, Suite 310 Dallas, Texas 75204 Telephone: (972) 564-8340 Facsimile: (866) 509-1197 Attorneys for Plaintiff Kelly Pinn, on her own behalf, and on behalf of all others similarly situated UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 8 KELLY PINN, an individual, on her own PLAINTIFF KELLY PINN'S behalf and on behalf of all others similarly ADMINISTRATIVE MOTION TO 9 **CONSIDER WHETHER ANOTHER** situated, PARTY'S MATERIAL SHOULD BE 10 Plaintiffs, SEALED 11 No. 4:22-cv-04048-DMR V. 12 CONSUMER CREDIT COUNSELING Judge Donna M. Ryu FOUNDATION, INC., NATIONAL BUDGET PLANNERS OF SOUTH 13 FLORIDA, INC., Florida corporations, and 14 ISHWINDER JUDGE, an individual, and DOES 1-10, inclusive, 15 Defendants. 16 17 NOTICE OF ADMINISTRATIVE MOTION TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD: 18 19 PLEASE TAKE NOTICE THAT Plaintiff Kelly Pinn ("Pinn" or "Plaintiff") hereby applies under Local Rules 7-11 and 79-5(f) to seal portions of her motion to sanction Defendants 2021 Consumer Credit Counseling Foundation, Inc. ("CCCF"), National Budget Planners of South Florida, Inc., and Ishwinder Judge (together, "Defendants"). 22 23 LOCAL RULE 79-5(f) ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHÉR PARTY'S MATERIAL SHOULD BE SEALED 24 This Administrative Motion is based on Local Rule 7-11 and 79-5(f) and the other 25 authorities cited herein and the supporting declarations, oral argument of counsel, and any other 26 matter that may be submitted at the hearing. 27 Plaintiff's motion to sanction incorporates the deposition of Porus Engineer and, e.g., 28

exhibits 31, 33, 34, and 35 to the Engineer deposition, to (1) demonstrate that Defendants' organization charts were incomplete and (2) identify irreconcilable discrepancies between CCCF's payroll records and the employee incentive policies that Defendants have provided Plaintiff. Defendants have designated exhibits 31, 33, 34, and 35 and related portions of the Engineer deposition (Tr. 102:1-108:15) as confidential under the Court's stipulated protective order. (ECF No. 32.) **CERTIFICATE OF SERVICE** Pursuant to 28 U.S.C. § 1746 and Local Rule 79-5.2(f), I hereby certify that a complete 8 set of these documents will be served on August 7, 2024 upon the parties below under Fed. R. Civ. P. 5(b) by emailing a copy of the foregoing to Defendants' last known address as follows: 10 11 Seth W. Wiener LAW OFFICES OF SETH W. WIENER 12 609 Karina Court San Ramon, California 94582 13 Telephone: (925) 487-5607 seth@sethwienerlaw.com 14 Attorneys for Defendants Consumer Credit Counseling 15 Foundation, Inc., National Budget Planners of South Florida, Inc., and Ishwinder Judge 16 17 Dated: August 7, 2024 By: s/Ethan Preston Ethan Preston (263295) 18 ep@eplaw.us PRESTON LAW OFFICES 19 4054 McKinney Avenue, Suite 310 Dallas, Texas 75204 20 Telephone: (972) 564-8340 Facsimile: (866) 509-1197 21 Attorneys for Plaintiff Kelly Pinn, on her 22 own behalf, and behalf of all others similarly situated 23 24 25 26 27 28